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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

Master File No. 3:07-cv-5944 JST

MDL No. 1917

**DECLARATION OF ATTORNEY  
JOSEPH SCOTT ST. JOHN ISO  
DOUGLAS W. ST. JOHN'S  
ADMINISTRATIVE MOTION TO  
FILE DOCUMENTS UNDER SEAL**

This Document Relates To:  
All Indirect Purchaser Actions

Judge: Hon. Jon S. Tigar

Special Master: Hon. Martin Quinn

1 I, Joseph Scott St. John, declare and state as follows:

2 1. I am an attorney duly licensed in the State of Mississippi, the State of Louisiana, and  
3 the District of Columbia. I represent Douglas W. St. John, a resident of the State of Mississippi, in  
4 connection with the above-captioned matter.

5 2. I make this declaration in support of Objector Douglas W. St. John's Administrative  
6 Motion to File Documents Under Seal.

7 3. I have personal knowledge of the facts stated herein, and if called and sworn as a  
8 witness, I would testify truthfully as follows.

9 4. Mr. St. John seeks to file the following document(s) under seal:

10 Exhibit 10 to the Declaration of Attorney Joseph Scott St. John ISO Objector Douglas W.  
11 St. John's Objection to Report & Recommendation, which includes the following  
12 documents:

- 13 1. DECLARATION OF MARIO N. ALIOTO IN SUPPORT OF INDIRECT  
14 PURCHASER PLAINTIFFS' REPLY RE: FINAL APPROVAL OF CLASS  
15 ACTION SETTLEMENTS WITH THE PHILIPS, PANASONIC, HITACHI,  
TOSHIBA, SAMSUNG SDI, THOMSON AND TDA DEFENDANTS  
(dated December 23, 2015)
- 16 2. ALIOTO EX. 1, SDCRT-0071129 (HIGHLY CONFIDENTIAL)
- 17 3. ALIOTO EX. 2, SDCRT-0009234 (HIGHLY CONFIDENTIAL)
- 18 4. ALIOTO EX. 3 CHU00647932 (CONFIDENTIAL) AND  
19 CHU00647945 (CONFIDENTIAL)
- 20 5. ALIOTO EX. 4 SDCRT-0203701 (HIGHLY CONFIDENTIAL)
- 21 6. ALIOTO EX. 5 HDP-CRT00056081 (HIGHLY CONFIDENTIAL)
- 22 7. ALIOTO EX. 6 SDCRT-0062013 (HIGHLY CONFIDENTIAL)
- 23 8. ALIOTO EX. 7 PHLP-CRT-093612 (CONFIDENTIAL)
- 24 9. ALIOTO EX. 8 EXCERPTS (PAGES 1, 193-194) FROM DEPOSITION OF  
25 JIM SMITH (dated December 12, 2013) (HIGHLY CONFIDENTIAL). Upon  
information and belief, Mr. Smith's testimony was designated highly confidential by  
Philips or LPD.
- 26 10. ALIOTO EX. 9 EXCERPTS (PAGES 1, 31) FROM DEPOSITION OF  
27 JAEIN LEE (dated June 6, 2012) (HIGHLY CONFIDENTIAL). Upon information  
28 and belief, Mr. Lee's testimony was designated highly confidential by Samsung SDI  
Co., Ltd.

11. ALIOTO EX. 10 MTPD-0164693 (CONFIDENTIAL)

12. ALIOTO EX. 11 EXCERPTS (PAGES 223, 251) FROM DEPOSITION OF W.R. KIM (dated July 2, 2014) (HIGHLY CONFIDENTIAL). Upon information and belief, Mr. Kim's testimony was designated as highly confidential by Samsung SDI Co., Ltd.

13. ALIOTO EX. 12 SDCRT-0002526 (HIGHLY CONFIDENTIAL) (with translation)

14. ALIOTO EX. 13 SDCRT-0002506 (HIGHLY CONFIDENTIAL) (with translation)

5. Each of the documents that Mr. St. John seeks to file under seal contain either (a) material designated by Defendants pursuant to the Stipulated Protective Order (D.E. 306, amended at D.E. 1142, June 18, 2008) as "Confidential" or "Highly Confidential" or (b) analysis of, references to, or information taken directly from material designated by Defendants pursuant to the Stipulated Protective Order as "Confidential" or "Highly Confidential."

6. Further declarant sayeth not.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in New Orleans, Louisiana this 4th day of February, 2016.

/s/ Joseph Scott St. John

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Joseph Scott St. John

**CERTIFICATE OF SERVICE**

I, Joseph Scott St. John, declare as follows: I am an attorney representing objector Douglas W. St. John connection with the above-captioned action. My address is 514 Mockingbird Drive, Long Beach, MS 39560. I am not a party to the above-captioned action, and I am over the age of eighteen. On February 4, 2016, I served copies of the foregoing declaration via ECF.

/s/ Joseph Scott St. John